

**EPA's Review: April 2016 RIWP for Administration Building (AOC 11a); and Hess' March 24, 2017 Response**

The RIWP is acceptable contingent that the following conditions are met:

- The final RIR must provide maps, among other information requirements, showing the 3-dimensional (horizontal and vertical) extent of contaminated soil and groundwater if they are contaminated above the applicable standards with all the related supporting data. If no maps are provided, any of the maps are determined inadequate in delineating such extent or any of the supporting data are determined insufficient, the RI is considered incomplete and further investigations will be required.
- Appropriate institutional controls must be in place to ensure that use of the Administration Building is limited only to commercial or industrial. Any residential usages may be allowed only after further VI investigation and, if necessary, implementing appropriate remedial measures.

**Additional Comments**

Hess' Response to 4<sup>th</sup> Comment: The April 2016 RIWP (Section 2.1, 3<sup>rd</sup> Paragraph) indicates that the ownership of the parcel where the Administration Building is located was transferred to Hess in 1957. The same RIWP (Section 1.0, 3<sup>rd</sup> Paragraph) also indicates that the QC lab in the Administration Building was closed in 1974. It appeared that the QC and related USTs were in operation between 1957 and 1974 while they were owned by Hess. Therefore, the response does not fully support the allegation, as noted in Section 2.1 (4<sup>th</sup> Paragraph), that it is a direct result of the former property use while under the ownership of PSC.

Hess' Response (1<sup>st</sup> Paragraph) to 9<sup>th</sup> Comment: It shows that, for the January 2016 VI investigation, a sub-slab soil gas sample could not be installed in the southernmost portion of the basement due to flooded conditions. The attached NJDEP memorandum dated March 12, 2008 also noted that there was flooding in the East Basement during the June 2007 indoor air investigation. It appears that the basement frequently gets flooded. As also requested in the NJDEP memorandum, please provide relevant information explaining the causes for the flooding – due to rain events, high groundwater table above the basement floor, backup flow due to sump failure and/or others.

Hess' Response to 10<sup>th</sup> Comment: The April 2016 RIWP (Section 4.1, 5<sup>th</sup> Paragraph) shows that three (3) sub-slab samples will be collected as part of the VI investigation. Therefore, even if the 3<sup>rd</sup> sample point was not installed during the previous VI investigation due to flooded basement, Figure 5 must show the location of the 3<sup>rd</sup> sub-slab sample.